



Dearbhú Cáilíochta  
agus Cáilíochtaí Éireann  
Quality and  
Qualifications Ireland



# Higher Education Pathway Assessment Report: Independent College



## About this assessment

This report details the findings of the assessment conducted by an Assessment Panel on behalf of Quality and Qualifications Ireland (QQI) of Independent College's IEM Application Statement (IEMAS), which was submitted to QQI as part of the provider's application for authorisation to use the TrustEd Ireland mark. The desk assessment was conducted by the following Assessment Panel:

Name	Role	Affiliation
Dr John Deane	Chairperson	Academic Dean, University of Wales Trinity Saint David, United Kingdom
Dr Margaret Fitzsimons	Report Writer/Secretary	Dean and Chief Learning Officer, Insitute of Banking, Ireland
Paul Mullally	International Education Expert	International Higher Education Consultant, Ireland
Lenka Vrancikova	Learner	Dundalk Institute of Technology, Ireland

## Outcome of the assessment

This assessment evaluates the provider's compliance with the criteria set out in the Code of Practice for Provision of Programmes of Higher Education to International Learners (HE Code). From the evidence provided by the provider in the self-assessment document, the IEM Application Statement (IEMAS), the Assessment Panel concludes that the provider should be:

Outcome	Please tick
Authorised to use TrustEd Ireland Mark	✓
Not Authorised to use TrustEd Ireland Mark	

Please see below a summary of the outcome by HE Code principle (5.1-5.6)

## 5.1 Marketing and Recruitment:

**Principle: HE providers recruit international learners in a transparent and ethical manner. In their marketing and promotional materials, they ensure that clear, accurate, transparent, accessible, relevant and up to date information is provided.**

5.1.1 (a) HE providers shall endeavour proactively to understand the information needs of prospective international learners.

5.1.1 (b) HE providers shall ensure that information provided to potential international learners about the institution and its provision is clear, accurate, transparent, accessible, relevant and up to date. This shall include information about the intended purpose of the provision e.g., to prepare a learner for further study or specific employment. Where necessary, it should also include information on associated immigration requirements, including requirements for learners requiring entry visas and/or immigration permission.

5.1.1 (c) Where applicable, information should also be provided on the professional accreditation status of programmes.

5.1.1 (d) Where applicable, information on practice placement requirements, and how these may be fulfilled, should also be made be known to prospective international learners.

5.1.1 (e) HE providers shall be compliant with information for learner requirements, as set out in Section 67 of the 2012 Act as amended. They shall confirm:

- (i) whether or not the successful completion of the programme entitles the learner to an award;
- (ii) the awarding body making the award;
- (iii) the title of the award;
- (iv) whether the award is one that is included within the NFQ;
- (v) the level at which the award is included within the NFQ;
- (vi) whether the award is a major, minor, special purpose or supplemental award, as identified within the NFQ;
- (vii) the procedures for access, transfer and progression that are in place, including the pathways for international learners for further study, employment, and residency, where applicable (see also section 4.2 above);
- (viii) details, where appropriate, of the arrangements in place for the protection of enrolled learners under Section 65 of the 2012 Act as amended (see section 4.5.2 above and Appendix Two of this code).

5.1.1 (f) HE providers shall ensure that information is provided in a way that is accessible to international learners and assists them in making informed decisions. This information should support international learners in understanding all matters related to a programme prior to enrolment. If provided in a different language, it is the responsibility of the HE provider to ensure that the information is clear, accurate, transparent, accessible, relevant and up to date.

5.1.1 (g) HE providers shall accurately represent their organisation and facilities in all marketing and promotional materials and ensure that no false or misleading information is issued.

5.1.1 (h) HE providers shall provide appropriate contact details for an appropriate person or persons to provide assistance with queries from international learners prior to enrolment.

5.1.1 (i) HE providers shall state the commencement dates for all programmes.

5.1.2 (a) Prior to enrolment, HE providers shall ensure the availability and provision of relevant financial information pertaining to the study and average subsistence costs of their programme provision, from the period of enrolment through to graduation.

5.1.2 (b) Prior to enrolment, HE providers shall ensure that the learner is made aware of any insurance requirements, e.g., medical or travel insurance, and of the availability of accommodation, and any accommodation services provided.

5.1.2 (c) HE providers shall have a written agreement with each education agent, recruitment partner or consultant that formally represents their programme provision.

5.1.2 (d) HE providers shall ensure that any contractual arrangements entered with an education agent, recruitment partner or consultant incorporate the principles of the London Statement. Existing contracts that do not incorporate these principles shall be amended appropriately within two years of the date of the HE provider's application for authorisation to use the IEM.

5.1.2 (e) The contract between the HE provider and education agent, recruitment partner or consultant shall include a termination clause in instances where the agent does not comply with the principles of the London Statement or is found to have acted in an unethical fashion to the detriment of international learners.

5.1.2 (f) HE providers shall conduct due diligence e.g., three reference checks, to verify the track record of education agents, recruitment partners or consultants, in relation to learner protection issues, prior to entering into a contractual agreement.

5.1.2 (g) HE providers shall ensure that all education agents, recruitment partners or consultants contracted to them are in possession of accurate and up to date information regarding the provider and its provision.

5.1.2 (h) HE providers shall have in place a transparent process for monitoring and reviewing the activities of education agents, recruitment partners or consultants including, where appropriate, feedback from applicants, to ensure that the education agent, recruitment partner or consultant is operating within the spirit of the HE Code and the London Statement.

5.1.2 (i) HE providers required to put in place arrangements for the protection of enrolled learners under Section 65 of the 2012 Act as amended shall do so prior to the recruitment of learners (see also section 4.5 and Appendix Two of this HE code).

## Summary

17 of the 18 criteria here are applicable to Independent College and IC is compliant across 16 and partially compliant across 1.

Independent College have said they are partially compliant with the criteria

5.1.2 (e). It is not clear how Independent College intends to become fully compliant with this criterion and this is something that should be made clear to QQI.

Based on the evidence submitted with the provider's TrustEd Ireland application, the panel is not satisfied that the provider the contract's between the provider and education agents, recruitment partners or consultants meets the requirements of 5.1.2 (e).

The panel therefore concludes that the provider is not compliant, and Independent College must ensure contracts with agents and similar partners include a termination clause and some method of reviewing agent activity.

### Condition 1

**5.1.2 (e):** Independent College will ensure that agent and similar partner contracts include a termination clause and a process of reviewing and monitoring the performance of agents in terms of their compliance with the principles of the London Statement.

This condition needs to be completed 24 weeks from the date of TrustEd Ireland authorisation.

### Principle 5.2 Admissions and Qualifications' Recognition:

#### **HE providers operate fair, transparent and consistent admission policies that support the successful participation of international learners in their chosen programmes**

5.2 (a) HE providers shall clearly specify entry requirements for international learners that support the successful participation of the learners in their chosen programmes.

5.2 (b) HE providers' entry requirements shall clearly specify English language proficiency requirements for applicants whose first language is not English. These should include references to the benchmarks used in assessing proficiency requirements and, like other entry requirements, support the successful participation of international learners in their chosen programmes.

5.2 (c) HE providers shall adopt the principles, and follow the guidance, contained in the Lisbon Recognition Convention (LRC) and subsidiary texts in assessing the qualifications presented by international learners for the purpose of admission to their programmes. Qualifications should be assessed in an accessible and fair manner and within a reasonable timeframe.

5.2 (d) HE providers should recognise qualifications that are recognised for the purpose of access to programmes in an international applicant's own higher education system, unless a substantial difference can be demonstrated between the requirements for admission in the applicant's own higher education system and those of the Irish HE provider.

5.2 (e) HE providers shall provide a timely written response to international applicants who are refused admission.

5.2 (f) Where a HE provider decides to withhold recognition of a qualification from an international learner for the purpose of admission, the reasons for the refusal to grant recognition shall be stated, and information provided concerning possible measures the applicant may take to obtain recognition at a later stage. If a HE provider decides to withhold recognition of a qualification for the purpose of admission, or if no decision is taken, the applicant shall be able to make an appeal within a reasonable time limit.

5.2 (g) HE providers shall support QQI, as appropriate, in implementing its statutory function to facilitate the recognition outside the state of awards made in the state, including the home countries of their international learners.

#### **Summary**

All seven criteria are applicable to Independent College, and IC are compliant across all 7 criteria, with a timebound recommendation for criteria 5.2 (c)-(f)

The panel reviewed the evidence in the IEMAS and uploaded data, including: 4.2 5.2 (a) & (b) Admissions, Transfer and Progression to Further Studies Policy.pdf, and further examples include the providers Admissions webpage process of interviewing 5.2 (a)-(b).

The provider has taken a considered approach to its Admissions policy and processes 5.2 (c)-(f).

However, the panel concluded that the provider should review its admission policy and processes against the principles and guidance in the LRC and subsidiary texts, and against criteria 5.2 (c)-(f), to establish clearly where gaps exist in institutional policy and practice.

### Recommendation 1

**5.2 (c)-(f):** The panel recommends that Independent College review its admissions policy and procedures and other relevant policies and processes against the principles and guidance in the Lisbon Recognition Convention (LRC) and subsidiary texts, and against criteria 5.2. (c)-(f) in the HE Code, to clearly establish where gaps exist in institutional policy and practice, within 12 months of TrustEd Ireland authorisation.

### Principle 5.3 Fees, Refunds and Subsistence:

**HE providers provide all learners with clear, accurate, transparent, accessible, relevant and up to date information on all study costs, including subsistence and accommodation. HE providers shall inform learners about fees and other costs associated with undertaking a programme of study in Ireland**

5.3.1 (a) HE providers shall provide information on compulsory fees for the full duration of the programme from registration and admission to graduation or exit from the programme. Where fees may change, this shall be clear to applicants in the information provided.

5.3.1 (b) HE providers shall provide information on the collection or payment of fees, including sanctions for late payment and debt collection for moneys owed.

5.3.1 (c) HE providers shall establish a fees structure that supports the mission of the organisation and reflects the costs associated with quality provision.

5.3.1 (d) HE providers shall ensure that there are no additional fees or unexpected charges that international learners have not been made aware of.

5.3.1 (e) HE providers shall issue a receipt to international learners upon receipt of payment of fees which will include a breakdown of fees paid.

5.3.1 (f) HE providers shall establish and publish a procedure on full and partial refunds. This procedure shall outline the conditions under which a refund will be granted e.g., a refused entry visa application, in the case of a non-EU/EEA Swiss learner.

5.3.1 (g) HE providers shall provide information on any financial supports or resources that exist within the organisation, or nationally, for international learners.

5.3.2 (a) HE providers shall provide information on the indicative costs of studying on their programmes e.g., the costs of textbooks, electronic resources, computer requirements, protective equipment.

5.3.2 (b) HE providers shall furnish prospective learners with general advice regarding the average cost of living e.g., accommodation, food, transport and medical care, for the programme duration.

5.3.2 (c) HE providers shall provide information on:

- (i) fees for accommodation services, if offered by the HE provider or other accommodation service providers;
- (ii) fees for complaints and appeals procedures as relevant e.g., rechecking of exam results.

5.3.2 (d) HE providers shall provide information on any other costs related to the provision of student services as considered relevant by the provider.

### Summary

All eleven criteria are applicable to Independent College, and they are fully compliant with all eleven criteria.

The panel reviewed a range of evidence in relation to 5.3.1 (a)-(g) and 5.3.2 (a)-(d) that includes a range of clear information on the website, in documentation such as Course Prospectuses and Letters to students. The provider has submitted evidence of each stage of the fees, refunds and subsistence process that are outlined transparently and openly for applicants.

### Principle 5.4 Supports and Services for International Learners

**HE providers shall foster a supportive environment which supports the wellbeing and integration of all learners into the student body and ensures a positive learning experience for all learners**

5.4.1 (a) HE providers shall designate appropriate personnel to be responsible for inquiries about learner support issues from international learners e.g., course coordinator, counsellor, or international officer.

5.4.1 (b) HE providers shall offer information to international learners prior to their arrival to help them adjust to their new surroundings e.g., information on transport, banking, availability of accommodation and accommodation services.

5.4.1 (c) HE providers shall ensure that inductions offered to learners also meet the needs of international learners, including intercultural awareness. They should direct learners to services, supports and facilities relevant or appropriate to their programme of study. They should also remind international learners requiring entry visas and/or immigration permissions of their responsibilities under the Department of Justice's student immigration regime.

5.4.1 (d) The induction programme shall be provided to all cohorts of international learners who register or enrol at various times of the year, including learners who access programmes through advanced entry.

5.4.1(e) HE providers shall provide information on appropriate learner supports and services to facilitate learner integration into the wider HE community.

5.4.1 (f) HE providers shall ensure that international learners are aware of opportunities to participate in, and be represented at, engagements between the provider and the learner body. Where possible, they should provide, in collaboration with learner representative bodies, information on national learner engagement initiatives and opportunities for international learners to avail of training opportunities.

5.4.1 (g) HE providers shall have mechanisms in place to support international learners financially in instances of personal or other emergency or hardship.

5.4.1 (h) HE providers shall facilitate and encourage feedback from international learners on the delivery of any supports and services. This includes informing learners about complaints processes for these services.

5.4.1 (i) Institutional approaches to quality assuring learner services and supports will include all learners, including international learners.

5.4.2 (a) HE providers shall offer induction that is accessible to all learners and, where appropriate, tailored to the needs of international learners. They shall provide full information and advice on all relevant institutional and academic policies.

5.4.2 (b) Induction shall be provided to learners and cohorts who enrol at different points during the year, including those accessing programmes through advanced entry.

5.4.2 (c) HE providers shall ensure the information provided at induction is easily accessible throughout the academic year and shall offer reminders of this information at key points during the year e.g., in the lead-up to examinations or submission of assignments.

5.4.2 (d) HE providers will include academic integrity as a core component of induction for all learners, including international learners. Recognition will be given in inductions to the different education cultures of international learners, and the content, advice and support they impart will be relevant and specific to the Irish higher education context. Formal and informal conversations about academic integrity should be held on an ongoing basis throughout the period of enrolment of all learners, including international learners.

5.4.2 (e) HE providers shall endeavour to integrate their international learners, through their inductions and through their policies, procedures, and services, into the wider learner community.

5.4.2 (f) HE providers shall continue to provide staff with training and support to facilitate an appropriate and effective delivery of programmes and services to international learners. This should include, where appropriate, training in intercultural competence and support for the development of English language education competence.

### Summary

All fifteen criteria are applicable to Independent College, and they are fully compliant with all fifteen criteria.

The panel reviewed the evidence in relation to 5.4.1 (a)-(i) including data on support such as Student Support Services, assessment data, academic integrity data, information on Learner Representation and Learner Feedback. The panel reviewed a range of evidence in relation to 5.4.2 (a)-(f) including an extensive induction programme, online sessions and face to face sessions on key topics such as academic integrity policy, extenuating circumstances, Learner Handbook and a range of sessions on building student belonging.

### Principle 5.5 English Language Policy Statement and International Foundation Year Programmes

**The English language supports provided by HE providers to international learners, including through the provision of international foundation year programmes, are underpinned by a coherent and transparent institutional policy approach.**

5.5 (a) HE providers shall have an English language policy statement for international learners that shall:

- (i) document the policy approach and process to the assessment of English language proficiency entry requirements;
- (ii) document, as appropriate, the institution's policy approach to the provision, support, and development of English for Academic Purposes;
- (iii) set out the institution's policy approach to the provision of English language supports to non-native English speakers prior to commencement and throughout the duration of their higher education programmes;
- (iv) document the arrangements, including, as appropriate, the quality assurance, credit and/or awarding arrangements, for different types of EAP programmes, such as:
  - pre-sessional programmes/modules
  - in-sessional programmes/modules

5.5 (b) HE providers offering international foundation year programmes shall set out in their English language policy statement for international learners

- (i) the quality assurance, credit and/or awarding arrangements for these programmes,
- (ii) the corporate and academic governance arrangements in place where such programmes are provided in partnership with other entities e.g., a private English language education provider, other independent/private education provider or campus company.

5.5 (c) For compliance with this HE Code, an international foundation programme shall lead to one of the following awards included within the NFQ:

- (i) QQI preparation for undergraduate programmes, leading to NFQ Level 5 Special Purpose Award (foundation qualification)
- (ii) QQI preparation for postgraduate programme, leading to NFQ Level 8 Special Purpose Award (foundation qualification)
- (iii) equivalent programmes leading to awards that are included within the NFQ and validated by an Irish awarding body.

5.5 (d) Where HE providers currently offer international foundation year programmes that do not lead to awards that are included within the NFQ, they must secure programme validation/course approval for such programmes through an Irish awarding body within two years of the date on which they are authorised to use the IEM.

## Summary

Three of the four criteria are applicable to Independent College, and they are partially compliant with all three criteria.

Based on the evidence submitted with the provider's TrustEd Ireland application, the panel is not satisfied that the provider has a standalone English Language Policy Statement (ELPS) 5.5 (a). The panel therefore concludes that the provider is partially compliant and that Independent College must provide a standalone ELPS.

### Condition 2

**5.5 (a):** Independent College must ensure the English Policy Statement is fully developed as a distinct standalone policy document, with details on English Language proficiency entry requirements, including any internal English language tests used, quality assurance arrangements, and credit awarding arrangements, where applicable, and that it is published 12 weeks following

TrustEd Ireland authorisation.

The panel noted the provider's guidance on English Language proficiency requirements and consideration of offering focused in-session English Language support to ensure international learners progress on their programme of study. The panel recommends the provider include further information on English Language entry requirements within 12 weeks of TrustEd Ireland authorisation and offering additional in-session English language support.

### **Recommendation 2**

**5.5. (a):** The panel recommends that the provider include further information on the English language proficiency entry requirements, including any internal English language tests used, by 12 weeks following TrustEd Ireland authorisation.

### **Recommendation 3**

**5.5. (a):** The panel recommends that the provider consider developing focused in-session English language support to help ensure international learners progress on their programme of study.

5.5 (b)-(c) Based on the evidence submitted with the provider's TrustEd Ireland application, the panel is not satisfied that the provider has submitted sufficient evidence on the partnership with OnCampus Ireland for the International Foundation Year and Pre-Masters programmes. There is no information on the NFQ level of the awards in the ATP document and no mention that the Pre-Master's programme is validated by TU Dublin. There is no information on the corporate and academic governance arrangements for this partnership. The panel therefore concludes that the provider is partially compliant, and Independent College must provide information in the ELPS on the quality and awarding arrangements and the corporate governance arrangements, and the NFQ awards for each programme offered by OnCampus Ireland 12 weeks from the date of TrustEd Ireland authorisation.

### **Condition 3**

**5.5 (b)-(c):** Independent College must ensure that the information in the English Language Policy Statement (ELPS) sets out the quality assurance and awarding arrangements and corporate and academic governance arrangements for each of the programmes offered by their partner OnCampus Ireland, as well as the NFQ awards and awarding bodies for the International Foundation Year and Pre-Master's programmes, by 12 weeks from the date of TrustEd Ireland authorization.

**Principle 5.6 International Learners outside the State**

**HE providers ensure that learners outside the state who are enrolled on their programmes receive quality learning experiences, where these programmes lead to awards that are included within the NFQ, and whether they are offered in transnational education settings and/or through remote, fully online modes of learning.**

5.6.1 (a) HE providers, having regard to their statutory quality assurance obligations, shall ensure that the academic quality, standard and recognition of their transnational education programmes are equivalent to the academic quality, standard and recognition of the programmes they provide within the state.

5.6.1 (b) HE providers shall apply the principles and criteria set out in this HE Code in an equivalent manner in transnational education settings, including in relation to the provision of learner support services.

5.6.1 (c) HE providers shall support QQI, as appropriate, in implementing its statutory function to facilitate the recognition outside the state of awards made in the state. This facilitatory function extends to awards included within the NFQ, where the programmes leading to these awards are provided outside the state.

5.6.1 (d) Linked providers who intend to offer transnational education programmes that lead to awards within the NFQ shall only do so with the agreement of the designated awarding body or bodies making the awards.

5.6.2 (a) HE providers, having regard to their statutory quality assurance obligations, shall ensure that the academic quality, standard and recognition of their remote online programmes are equivalent to the academic quality, standard and recognition of the programmes they provide through other teaching and learning modes.

5.6.2 (b) HE providers shall apply the principles and criteria set out in this HE Code in an equivalent manner in relation to learners outside the state enrolled on remote online programmes that lead to awards included within the NFQ, including in relation to the provision of learner support services.

5.6.2 (c) HE providers shall support QQI, as appropriate, in implementing its statutory function to facilitate the recognition outside the state of awards made in the state. This facilitatory function extends to awards included within the NFQ, where the programmes leading to these awards are offered as remote online programmes.

5.6.2 (d) Linked providers who intend to offer remote online programmes to learners outside the state that lead to awards within the NFQ shall only do so with the agreement of the designated awarding body or bodies making the awards.

**Summary**

None of these criteria is applicable to Independent College

## Summary of assessment outcomes

### This section provides for the Assessment Panel findings and outcomes by principle and criterion

#### Overview of the provider's international profile and activities

Independent College (IC) founded in 2007, is 100% Irish owned and provides QQI validated, NFQ Level 6, 8 and 9 programmes in the areas of Business, Law, Marketing, Accounting, Finance and International Business.

In 2025, Independent College joined with Dublin Academy of Education, International House Dublin and Public Affairs Ireland to form the Axis Education Group. It is too early to make any judgements on the potential benefits or challenges presented by this new ownership structure for Independent College and its potential impact on the quality of provision for learners.

The number of International students is less than 1,000. Multiple departments across Independent College work together to support international students with pre-arrival induction, orientation, academic support, career and counselling, workshops and cultural events. The Admissions Office is the first point of contact for International Students. It assists applicants to ensure they meet the entry requirements and also supports them with visa-related concerns, preparing them to move abroad through open day and pre-departure sessions. The overwhelming majority of IC students come from Brazil.

IC does not engage in any transnational education activity. IC currently does not offer remote, fully online education. The College does not currently enrol international earners based outside the state for remote or fully online education. IC uses Agents to recruit students and there are clear contracts in place outlining the terms of the agreement with agents.

Founded in 2007, the college enjoys a central Dublin location, strong collegiate academic and administrative teams, and recruits some of its learners via a small number of high-quality student recruitment partners. The College has enjoyed recent success with reengagement with QQI and the review and validation of QQI validated programmes at Level 8 and Level 9.

#### Recommended condition(s) for authorization:

##### Condition 1

**5.1.2 (e):** Independent College will ensure that agent and similar partner contracts include a termination clause and a process of reviewing and monitoring the performance of agents in terms of their compliance with the principles of the London Statement.

This condition needs to be completed 6 months from the date of TrustEd Ireland authorisation.

### **Condition 2**

**5.5 (a):** Independent College must ensure the English Policy statement is fully developed as a distinct policy document, with details on English Language proficiency entry requirements, including any internal English language tests used, quality assurance arrangements, and credit awarding arrangement, where applicable, and that it is published 12 weeks following TrustEd Ireland authorisation.

### **Condition 3**

**5.5 (b)-(c):** Independent College must ensure that the information in the English Language Policy Statement (ELPS) sets out the quality assurance and awarding arrangements, the corporate and academic governance arrangements, and the NQF awards for each programme 12 weeks from the date of TrustEd Ireland authorisation.

### **Commendations:**

N/A

### **Recommendations:**

#### **Recommendation: 1**

**5.2 (c)-(f):** The panel recommends that Independent College (IC) must review its admissions policy and procedures and other relevant policies and processes against the principles and guidance in the Lisbon Recognition Convention (LRC) and subsidiary texts against criteria 5.2. (c)-(f) and the HE Code to clearly establish where gaps exist in institutional policy and practice.

Independent College to develop an action plan for the implementation of this recommendation within 12 months of TrustEd Ireland authorisation.

#### **Recommendation 2**

**5.5 (a):** The panel recommends that the provider include further information on the English language proficiency entry requirements, including any internal English language tests used, by 12 weeks following TrustEd Ireland authorisation.

#### **Recommendation 3**

**5.5 (a):** The panel recommends that the provider consider developing focused in-session English language support to help ensure international learners progress on their programme of study.

### **Declarations of Assessment Panel**

This report has been agreed by the Assessment Panel and is signed on their behalf by the Chairperson.

Assessment Panel Chairperson:

Date: 06/10/25

Signed: JJ Deane



International Education Division, QQI  
By Email

### **RE: TrustEd Ireland (HE Pathway) –Provider Response**

The College welcomes the expert feedback provided by the Assessment Panel via the Assessment Report on behalf of QQI of the College's IEMAS Application Statement (IEMAS), which was submitted to QQI as part of the College's application for authorisation to use the TrustEd Ireland mark.

The College accepts the findings of the panel and have addressed the conditions and recommendations as set out below. Supporting evidence is available via documentation uploaded to Qhub labelled for each condition and recommendation.

#### **5.1.2. (e) Condition 1 – Accepted**

The College's initial designation of *partial compliance* reflected the position at the time of the original submission of the IEMAS application, during which a review and enhancement of the College's partnership agreement was actively underway. As part of the self-reflective process undertaken in preparation for the IEMAS, the College formally revised its partnership agreement in February 2025 to include clearly defined termination clause and to incorporate a direct hyperlink to the London Statement, thereby more firmly embedding these principles as the formal foundation governing the conditions of partner agencies. Subsequent to this revision, the updated agreement has been implemented for all new partnership onboarding from February 2025 onwards [see 5.1.2 (e) Condition 1 SAMPLE Agreement Update]. In parallel, the College initiated a structured process to update all pre-existing partnership agreements to this revised version. This process was completed in August 2025.

In addition, the College maintains a comprehensive monitoring and evaluation framework designed to ensure ongoing compliance and effectiveness of partner agencies. This system operates through a five-tier classification model Partner status and tier movement are reviewed bi-annually (March and September). Assessments are based on a composite of measurable performance indicators. This structured monitoring process, combined with the updated contractual provisions and explicit alignment with the London Statement, ensures that all partners operate in accordance with these guiding principles, and that compliance is regularly reviewed and actionable.

Therefore, the College now confirms full compliance with Criterion 5.1.2 (e).

#### **5.5 (a) Condition 2 – Accepted**

As part of the self-evaluation process undertaken during the IEMAS, the College initiated a comprehensive review and update of its English language proficiency entry requirements. This review sought both to increase the clarity and transparency of entry requirements for prospective students, and to align minimum English proficiency thresholds more closely with

the academic demands of the relevant programmes. Following detailed analysis and consultation, the updated entry requirements were formally proposed to and approved by the Quality Assurance Subcommittee in mid-May 2025, and subsequently ratified by Academic Council at the end of May 2025. The revised requirements were implemented with effect from 1 June 2025, as confirmed in formal communication issued to all recruitment partners and agents in May 2025. The updated English language proficiency criteria are publicly available on the Admissions page of the College website.

In parallel, the College has undertaken a series of measures to evaluate and enhance the quality and effectiveness of the Independent College Remote English Test, which is offered as part of the admissions process. A dedicated working group was convened for this purpose, first meeting on 23 July 2025, with subsequent sessions held on 10 August 2025 and 12 November 2025, respectively. Records of meeting action points and corresponding Quality Assurance proposals for examination process amendments are attached in support of this response.

Through the deliberations of this Working Group, actionable improvements to the Remote English Test have been identified, including updates to the test structure and moderation processes. The implementation and public communication of these changes are scheduled for completion by February 2026.

It is anticipated that the English Policy Statement will be available as a distinct standalone policy document after the Quality Assurance Subcommittee and Academic Council meet and approve the College Quality Assurance Manual in Spring 2026. As per the condition the updated policy for approval provides details on English Language proficiency entry requirements, including any internal English language tests used, quality assurance arrangements, and credit awarding arrangements, where they are applicable.

Upon ratification by Academic Council of the English Policy Statement the College will have full compliance with Criterion 5.5 (a).

### **5.5 (b-c) Condition 3 – Accepted**

As per 5.5 (a) Condition 2, the English Language Policy Statement is in the process of being updated to sit as standalone policy in the College Quality Assurance Manual. This work will be completed by Spring 2026. The update to the English Policy Statement document will set out in more detail the quality assurance and awarding arrangements and corporate and academic governance arrangements for each of the programmes offered by our partner OnCampus Ireland, namely the International Foundation Year and Pre-Master's programmes. In the meantime, further evidence on the partnership with OnCampus Ireland for the International Foundation Year and Pre-Masters programmes has been uploaded to Qhub. Supplementary information on the OnCampus governance and QA management approaches are contained in the respective UG and Premasters QA documents listed on the following website, <https://www.oncampus.global/our-study-centres/oncampus-ireland/oncampus-ireland-quality-assurance>.

**5.2. (c-f) Recommendation 1: Accepted**

The College accepts this recommendation and has commenced a further review of the admissions policy and procedures and other relevant policies and processes against the principles and guidance in the Lisbon Recognition Convention (LRC) and subsidiary texts against criteria 5.2. (c-f) and the HE Code to clearly establish where gaps exist in institutional policy and practice.

This review has been assigned to Head of Quality Assurance and will be completed with any required policy updates completed by Spring 2026.

**5.5. (a) Recommendation 2: Accepted**

The College accepts this recommendation and further information/ supporting evidence of updates on English language proficiency entry requirements, including any internal English language tests used has been uploaded to Qhub.

The College now confirms full compliance with Criterion 5.5 (a).

**5.5 (a) Recommendation 3: Accepted**

The College accepts this recommendation and further information on updates to in-session English language support to help ensure international learners progress on their programme of study. This initiative was implemented prior to the College receiving the Assessment Panel's Report.

The College now confirms full compliance with Criterion 5.5 (a).

Thank you again to the Assessment Panel and the staff in the International Education Division for their support and guidance through the IEMAS process. Should you have any about the information above, please do not hesitate to contact me [paula.kenny@independentcollege.ie](mailto:paula.kenny@independentcollege.ie).

Yours sincerely



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Dr. Paula Kenny  
Deputy President